

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

v.

ENRIQUE K. RAZON, JR., BLOOMBERRY
RESORTS AND HOTELS, INC., and
SURESTE PROPERTIES, INC.,

Defendants.

No. 21-CV-2655 (LGS) (SN)

**STIPULATION AND PROPOSED
ORDER REGARDING BRIEFING
SCHEDULE**

THIS STIPULATION AND PROPOSED ORDER REGARDING BRIEFING SCHEDULE is agreed to and submitted on behalf of Plaintiff Global Gaming Philippines, LLC (“GGAM”), and Enrique K. Razon, Jr. (“Razon”) (together, the “Parties”).

WHEREAS, GGAM filed its Second Amended Complaint (ECF No. 218) on March 28, 2022 (“SAC”);

WHEREAS, Defendant Razon filed his Partial Motion to Dismiss the SAC (ECF No. 235) on April 18, 2022 (“MTD”);

WHEREAS, GGAM’s Opposition to the MTD is currently due on Monday, May 2, 2022 (“Opposition”);

WHEREAS, GGAM may need to retain an expert in preparation of the Opposition in order to respond to the submission of Defendant Razon’s expert in the MTD;

WHEREAS, the close of fact discovery is on June 2, 2022 and the Parties wish to continue on the current agreed deposition schedule;

IT IS HEREBY STIPULATED, AGREED, AND ORDERED THAT:

1. GGAM's Opposition to Razon's MTD will be due on June 17, 2022;
2. Razon's Reply to GGAM's Opposition will be due on July 17, 2022;
3. The Parties further agree to defer any discussions about discovery, if any, regarding punitive damages until the earliest of one of the following: (i) the Court rules on the MTD; or (ii) the Parties agree to a stipulation of facts that obviate the need for discovery regarding punitive damages; and
4. The Parties agree to meet and confer regarding the scope, if any, of Mr. Razon's deposition with respect to punitive damages.

Dated: May 2, 2022
New York, NY

SO STIPULATED:

Mintz, Levin, Cohn, Ferris, Glovsky and
Popeo, P.C.

/s/ Kevin N. Ainsworth

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*Attorneys for Defendant
Enrique K. Razon*

SO ORDERED:

_____, 2022

LORNA G. SCHOFIELD
United States District Court